

1 BRIAN FAHLING, WSBA #18894
2 Law Office of Brian Fahling
3 559 Old Mill Rd
4 Sandpoint, ID 83864
5 (425) 802-7326

6 ERIC KNIFFIN
7 Kniffin Law PLLC
8 102 S. Tejon St., Suite 1100
9 Colorado Springs, CO 80903
10 (719) 212-4391

11 ERIC JOB SEESE
12 Frost Brown Todd LLP
13 1801 California Street, Suite 2700
14 Denver, CO 80202
15 (303) 406-4990

16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF WASHINGTON**

18 NICHOLAS ROLOVICH,

19 Plaintiff,

20 v.

21 WASHINGTON STATE
22 UNIVERSITY, et al.,

23 Defendants.

NO. 2:22-cv-00319

**DECLARATION OF
ERIC KNIFFIN**

*[Filed Concurrently with
Plaintiff's Motion for
Partial Summary Judgment]*

24 DECLARATION OF
ERIC KNIFFIN
NO. 2:22-cv-00319-TOR

LAW OFFICE OF BRIAN FAHLING
559 Old Mill Rd
Sandpoint, ID 83864
(425) 802-7326
E: bfahling@fahlinglaw.com

1 I, Eric Kniffin, declare as follows:

2 1. I am an attorney with Kniffin Law PLLC, representing Plaintiff. I have
3 personal knowledge of the facts set forth herein.

4 2. Attached as **Exhibit A** is a copy of the Declaration of Nicholas Rolovich, dated
5 September 23, 2024.

6 3. Attached as **Exhibit B** are copies of produced documents representing text
7 messages between Plaintiff Nicholas Rolovich and Father Paul Heric.

8 4. Attached as **Exhibit C** is a copy of a letter written by Bishop Daly, the
9 Catholic Bishop of the Diocese of Spokane, dated August 20, 2021.

10 5. Attached as **Exhibit D** is a copy of Exhibit 2 to the deposition of Ms. Marty
11 Dickinson, taken July 30, 2024.

12 6. Attached as **Exhibit E** is a copy of Exhibit 83 to the deposition of Ms. Lisa
13 Gehring, taken August 20, 2024.

14 7. Attached as **Exhibit F** is a copy of Defendant's Expert Report of M. Therese
15 Lysaught, PhD, dated August 9, 2024.

16 8. Attached as **Exhibit G** is a copy of Exhibit 87 to the deposition of Ms. Lisa
17 Gehring, taken August 20, 2024.

18 9. Attached as **Exhibit H** is a copy of Exhibit 7 to the deposition of Mr. Phil
19 Weiler, taken August 1, 2024.

20 10. Attached as **Exhibit I** is a copy of Exhibit 76 to Ms. Lisa Gehring's
21 deposition, taken August 20, 2024.

22 11. Attached as **Exhibit J** is a copy of Exhibit 86 to Ms. Lisa Gehring's
23 deposition, taken August 20, 2024.

24 12. Attached as **Exhibit K** is a copy of Exhibit 90 to Ms. Lisa Gehring's
deposition, taken August 20, 2024.

DECLARATION OF
ERIC KNIFFIN
NO. 2:22-cv-00319-TOR - 1

LAW OFFICE OF BRIAN FAHLING
559 Old Mill Rd
Sandpoint, ID 83864
(425) 802-7326
E: bfahling@fahlinglaw.com

1 13. Attached as **Exhibit L** is a copy of excerpts from the transcript of the
2 deposition of Bonnie Dennler, taken August 21, 2024.

3 14. Attached as **Exhibit M** is a copy of Defendant's Answers and Objections to
4 Plaintiff's First Set of Requests for Admission to Defendant.

5 15. Attached as **Exhibit N** is a copy of Exhibit 91 to Ms. Lisa Gehring's
6 deposition, taken August 20, 2024.

7 16. Attached as **Exhibit O** is a copy of Exhibit 92 to Ms. Lisa Gehring's
8 deposition, taken August 20, 2024.

9 17. Attached as **Exhibit P** is a copy of Exhibit 93 to Ms. Lisa Gehring's
10 deposition, taken August 20, 2024.

11 18. Attached as **Exhibit Q** is a copy of Exhibit 94 to Ms. Lisa Gehring's
12 deposition, taken August 20, 2024.

13 19. Attached as **Exhibit R** is a copy of Defendant's Expert Report of Renee
14 DiResta, dated August 9, 2024.

15
16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct to the best of my knowledge.

18 Executed on September 23, 2024, in Colorado Springs, Colorado.

19 /s/ Eric N. Kniffin

20 Eric N. Kniffin.

21
22
23
24
DECLARATION OF
ERIC KNIFFIN
NO. 2:22-cv-00319-TOR - 2

LAW OFFICE OF BRIAN FAHLING
559 Old Mill Rd
Sandpoint, ID 83864
(425) 802-7326
E: bfahling@fahlinglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of September, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I hereby certify that none of the represented parties are non-CM/ECF participants.

Executed this 23rd day of September, 2024, at Denver, Colorado.

By: /s/ E. Job Seese
E. Job Seese
Frost Brown Todd LLP
1801 California Street, Suite 2700
Denver, CO 80202
Tele: 303.623.9000
jseese@fbtlaw.com

DECLARATION OF
ERIC KNIFFIN
NO. 2:22-cv-00319-TOR - 3

LAW OFFICE OF BRIAN FAHLING
559 Old Mill Rd
Sandpoint, ID 83864
(425) 802-7326
E: bfahling@fahlinglaw.com